

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Name and address of Plaintiff:

Trent Tompkins

55 Thompson Road

Mercer, PA 16137

v.

Full name, title, and business address
of each defendant in this action:

1 PrimeCare Medical Inc.

3940 Locust Lane

Harrisburgh, PA 17109

2 Erna Craig (both capacities)

55 Thompson Road

Mercer, PA 16137

Use additional sheets, if necessary

Number each defendant.

FILED

AUG 28 2019

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

I. Where are you now confined? Mercer County Jail

What sentence are you serving? unsentenced/pending

What court imposed the sentence? Mercer County

II. Previous Lawsuits none

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) and docket number

Additional Defendants

3. Three john doe defendants, whose names are unknown to me, whom I hope to identify from photos and incident reports provided in discovery.
4. Eight john doe defendants, of whom I know at least one of their names. I would like to review incident reports and other evidence before deciding which staff to sue in personal capacity.

3. Name of judge to whom case was assigned _____
4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

5. Approximate date of filing lawsuit _____

6. Approximate date of disposition _____

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? _____

When? _____

Result: _____

III. What federal law do you claim was violated? Constitution
Turner v Safely, 1st amen., "due process",
"cruel and unusual punishment"

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

- A. Date of event: Sept 2017-ongoing (physical abuse till Feb.2018)
- B. Place of event: Mercer Prison, 55 Thompson Road, Mercer, PA
- C. Persons involved--name each person and tell what that person did to you: I INTEND TO AMEND AFTER DOCUMENTS ARE PROVIDED
PrimeCare Medical Inc. provided improper care, failed to stop
or report abuse, or accommodate schizophrenia.
Need Discovery to determine culpability based on policies.
Erna Craig personally violated Turner v Safely standard
and denied me books despite several grievances.
As Warden, may have failed to supervise, train, hire or fire
staff; been negligent, set flawed or improper policies,
failed to hospitalise me when appropriate, failed to supervise
or follow stated procedure and fostered a "culture of abuse".
DISCOVERY IS NEEDED. THE JAIL HAS REFUSED INCIDENT REPORTS
NEEDED TO PROPERLY PROVIDE DETAILS OR OBTAIN COUNSEL.

John Doe defendants (all prison staff) are responsible for
unjustified abuse and use of force, documented in part in
"incident reports" the jail is withholding.

Reports and discovery is vital to determining culpability,
as not all John does may be personally named.

V. Did the incident of which you complain occur in an institution or place of custody in this District?

If so, where?

Yes, 55 Thompson Road, Mercer, PA 16137

and answer the following questions:

A. Is there a prisoner grievance procedure in this institution?

Yes (☒) No ()

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes (☒) No ()

C. If your answer is YES,

1. What steps did you take? filed numerous grievances, of which the jail
has refused to provide copies. Recently filed grievance with
prison board via certified mail to obtain records.

2. What was the result? Refused incident reports, no action taken.
I was told by admin. secretary policy "in use" differs from
policy in handbook, which still refers to paper forms.

D. If your answer is NO, explain why not: _____

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

Yes () No ()

F. If your answer is YES,

1. What steps did you take? _____

2. What was the result? _____

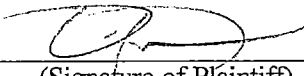
VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no
cases or statutes.

Money damages. TRO and injunctions will be filed as separate
motions.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT.

August 23th, 2019
(Date)

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(Signature of Plaintiff)